

UNITED STATES BANKRUPTCY COURT
211 W. FORT STREET, SUITE 2100
DETROIT, MICHIGAN 48226

DARRYL CAIN
PLAINTIFF

v.

FRANK CARROLL &
CITY OF DETROIT

FILED

2013 DEC 12 A 11:46

U.S. BANKRUPTCY COURT
E.D. MICHIGAN-DETROIT

CASE No.2:13-cv-10525

CHAPTER: 9

CASE No.:13-53846

JUDGE: HON.STEVEN W.RHODES

-MOTION FOR THE APPOINTMENT OF COUNSEL


Plaintiff, Darryl Cain, in LIEU of motion for the appointment of counsel (Fed R. Civ Pro, Title 28 USC, 1915). However, requests this Court to appoint counsel to represent him in this case for the following reasons:

1. The Plaintiff is unable to afford counsel, I am an indigent prisoner with no job or income.
2. The issues involved in this case and Defendant(s) motion are complex and there are complexities in the details of the Defendant(s) pleading, NOTICE OF MOTION OF DEBTOR, PURSUANT TO SECTIONS 105 AND 502 OF THE BANKRUPTCY CODE, FOR ENTRY OF AN ORDER APPROVING ALTERNATIVE DISPUTE RESOLUTION PROCEDURES TO PROMOTE THE LIQUIDATION OF CERTAIN PREPETITION CLAIMS.
3. The Plaintiff has a limited knowledge of the law, I have no technical legal training, coupled with the fact that I am currently housed at a high security level and the environment is often volatile and law library is either operated slowly or it is cancelled.

WHEREFORE, I pray that this Honorable Court grant me this privilege and request counsel to accept my case. I believe strongly that I have been victimized by the City of Detroit and officer Frank Carroll and I should have my day in Court, AND I de-

best of my knowledge, information, and belief.

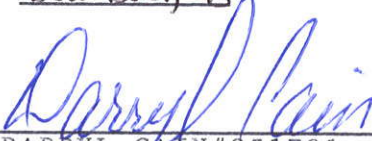
DATED: December 8, 2013


DARRYL CAIN #351791
PLAINTIFF IN PRO PER
2500 S. SHERIDAN DRIVE
MUSKEGON HEIGHTS, MI 49444

CERTIFICATE OF SERVICE

I hereby certify that I mailed by expedited legal mail to Defendant(s) Attorney(s) ERMAN, TEICHER, MILLER, ZUCKER & FREEDMAN 400 GALLERIA OFFICENTRE, SUITE 444, **SOUTHFIELD, MI** 48034-2162 a copy of MOTION FOR THE APPOINTMENT OF COUNSEL on December 8, 2013.

DATED: December 8, 2013


DARRYL CAIN #351791
PLAINTIFF IN PRO PER
2500 S. SHERIDAN DRIVE
MUSKEGON HEIGHTS, MI 49444